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 Attorneys for defendant
 6 CAPTAIN JOHN J. COTA

7
 8 **UNITES STATES DISTRICT COURT**
 9 **NORTHERN DISTRICT OF CALIFORNIA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 M/V COSCO BUSAN, LR/IMO Ship No.
 9231746, her engines, apparel, electronics,
 14 tackle, boats, appurtenances, etc., in rem, THE
 SHIPOWNERS' INSURANCE & GUARANTY
 15 COMPANY LTD., REGAL STONE LIMITED,
 FLEET MANAGEMENT LTD., and JOHN
 16 COTA, in personam,

17 Defendants.

CASE NO.: CV 07 6045 SC

IN ADMIRALTY

STIPULATION AND REQUEST FOR
 ORDER EXTENDING CAPTAIN
 JOHN COTA'S TIME TO RESPOND
 TO THE COMPLAINT (FIRST
 EXTENSION)

21 The parties below-signed through their counsel stipulate and request pursuant to L.R. 6-
 22 1(b) and 6-2 that this court order that defendant Capt. John Cota is granted by stipulation a first
 23 extension of time to move, answer or otherwise respond to the complaint herein for ~~60 days to~~ ^{30 days}
 24 ~~and including April 14, 2008~~ because he and his current counsel may affiliate or substitute in
 25 new counsel and they desire additional time to clarify his defenses and legal status before
 26 responding to the complaint. (Capt. Cota has been named in four lawsuits arising from the
 27 incident underlying this complaint.)

28 Capt. Cota, through his undersigned counsel, represents that he will participate in the

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**STIPULATION AND REQUEST FOR ORDER EXTENDING CAPTAIN JOHN COTA'S TIME TO
 RESPOND TO THE COMPLAINT (FIRST EXTENSION) (CV 07 6045 SC)**

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1 preparation of a case management statement and attend the Case Management Conference(s).

2 Dated: February 7, 2008

3
4 U.S. DEPARTMENT OF JUSTICE
JEFFREY S. BUCHOLTZ
5 Acting Assistant Attorney General

LAW OFFICES OF GEORGE W. NOWELL

6 By: /s/ R. Michael Underhill
7 R. MICHAEL UNDERHILL
8 Attorney in Charge, West Coast Office
Torts Branch, Civil Division
9 GEOFFREY D. OWEN
Trial Attorney
10 U.S. Department of Justice

By: George W. Nowell
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11 RONALD J. TENPAS
12 Acting Assistant Attorney General
Environment and Natural Resources Division
13 U.S. Department of Justice
14 BRADLEY R. O'BRIEN
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MCGUIREWOODS LLP
By: Richard L. Jarashow
RICHARD L. JARASHOW
Attorneys for defendant
SHIPOWNERS' INSURANCE &
GUARANTY COMPANY LTD.

16 Attorneys for plaintiff
17 UNITED STATES OF AMERICA

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19 PURSUANT TO STIPULATION, IT IS SO ORDERED.

20
21 Dated: February 7, 2008

22 30 day Extension
23 [Signature]
24 U.S. DISTRICT JUDGE